## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA

In re: : Chapter 7

SAMUEL DELACRUZ,

Debtor, : Bankruptcy No. 23-11283 pmm

## SECOND STIPULATION EXTENDING TIME TO FILE A COMPLAINT UNDER SECTION 727 OR A MOTION TO DISMISS UNDER SECTION 707

AND NOW, this 10TH day of October, 2023, it is hereby agreed and stipulated to between Attorney for the debtor, Larry W. Miller, Jr., Esq. and Bonnie B. Finkel, the chapter 7 trustee as follows:

The parties hereby agree, that the time for the Chapter 7 Trustee and for the US Trustee to file a Complaint to Deny Discharge under Section 727 and/or a Motion to Dismiss under 707 is hereby extended a second time for an additional 70 days past the previous deadline date of October 27, 2023. The Trustee had requested additional financial information including the business income, personal income, and bank statements from approximately 30 bank accounts which had not been previously disclosed, and she needs additional time to review the large volume of documentation provided in this potential asset case.

Therefore, the parties agree that the new deadline for the Trustee or U.S.Trustee to file a Complaint or a Motion to Dismiss will be January 5, 2024.

This Stipulation can be executed in counterparts and filed in counterparts so, that it

is as if it were one integrated document

Larry W. Miller, Jr., Esq.

Attorney for Debtor

Bonnie B. Finkel, Esq.

Chapter 7 Trustee

## **ORDER**

NOW, this day of , 2023, IT IS HEREBY ORDERED AND DECREED that the above Stipulation be approved.

HONORABLE PATRICIA M. MAYER
United States Bankruptcy Judge